

FILED
RECEIVED
LODGED
JAN 14 2019
AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

UNITED STATES DISTRICT COURT

for the
Western District of Washington

BY

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

The Google account xanderg2488@gmail.com,
hosted at premises controlled by Google LLC, located at 1600
Amphitheater Parkway, Mountain View, CA 94043, as further described in
Attachment A

Case No.

MJ19-014

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

The Google account xanderg2488@gmail.com, hosted at premises controlled by Google LLC, located at 1600 Amphitheater Parkway, Mountain View, CA 94043, as further described in Attachment A

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B for a list of information to be disclosed

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
Title 18, U.S.C. § 1343

Wire Fraud

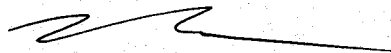
Offense Description

The application is based on these facts:

See attached Affidavit of Special Agent Milas Howe

☒ Continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

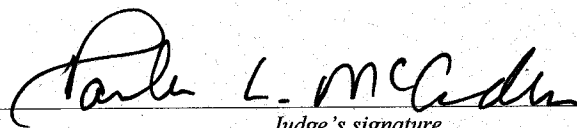
Milas Howe, Special Agent FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/14/2019

City and state: Seattle, Washington



Judge's signature

United States Magistrate Judge Paula L. McCandlis

Printed name and title

AFFIDAVIT OF SPECIAL AGENT MILAS HOWE

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

I, Milas Howe, a Special Agent with the Federal Bureau of Investigation in Seattle Washington, having been duly sworn, state as follows:

INTRODUCTION

1. ***Affiant Background:*** I am a Special Agent with the Federal Bureau of Investigation (FBI), assigned to the White Collar Crime Squad of the Seattle, Washington Headquarters Field Office. I have worked with the FBI since May 2017. I am responsible for investigating violations of federal statutes governing various types of white collar crime, including wire fraud, mail fraud, bank fraud, securities fraud, money laundering, and theft of government and public money. Prior to working for the FBI, I spent over ten years in the accounting industry working as both an internal and external auditor. I am a licensed Certified Public Accountant, Certified Fraud Examiner, and Certified Information Systems Auditor.

2. ***Purpose and Scope of the Affidavit:*** The FBI has been investigating allegations that Keenan Gracey defrauded investors out of millions of dollars between 2016 and 2018 by purporting to sell them “pre-IPO” stock to which he claimed to have special access, but which he in fact did not own and had no authority to sell. The matter came to the FBI’s attention through a referral from the Securities and Exchange Commission (“SEC”). My investigation has included witness interviews, the review of documents, including financial records, email and text communications and other documents, and of materials prepared and obtained by the SEC in its investigation of Gracey. Based on my review of this evidence, and as discussed below, there is probable cause to believe that Gracey defrauded investors of approximately \$6 million through fraudulent stock sales, and thereby committed the crime of wire fraud in violation of Title 18, United States Code, Section 1343.

1 3. This Court previously issued a warrant for Gracey's arrest, and a warrant to
2 search an email account used by Gracey with the address "tijor24@gmail.com."
3 Evidence developed since that time establishes that, Gracey's fraud was discovered by
4 the SEC, Gracey began using used a second email account with the address
5 "xanderg2488@gmail.com" (the "Subject Account") in connection with his fraud, which
6 continued until December 2018. This Affidavit establishes probable cause to support the
7 issuance of a warrant to search the Subject Account for additional evidence of violations
8 of Title 18, United States Code, Section 1343.

9 4. The information set forth in this Affidavit is not intended to detail each and
10 every fact and circumstance of the investigation or all information known to me or the
11 investigative participants. Rather, this Affidavit is intended to present the facts relevant
12 to the issue of whether probable cause exists to issue the requested search warrant.

13 **JURISDICTION**

14 5. This Court has jurisdiction to issue the requested warrant because it is "a
15 court of competent jurisdiction" as defined by 18 U.S.C. § 2711. Specifically, the Court
16 is "a district court of the United States . . . that has jurisdiction over the offense being
17 investigated." 18 U.S.C. § 2711(3)(A)(i).

18 **STATEMENT OF PROBABLE CAUSE**

19 **A. Background**

20 6. Many of the facts relevant to this investigation are described in detail in the
21 attached Complaint (Appendix 1), which is incorporated herein by reference. As
22 explained therein, witness statements, documents, and other evidence establish that
23 Keenan Gracey is a Canadian national who has lived primarily in Washington since at
24 least 2006. Gracey has no particular background in business or finance. However,
25 beginning no later than June 2016, Gracey began portraying himself to others as a British
26 billionaire and financier. To support this image, Gracey rented houses worth millions or
27 tens of millions of dollars, and told potential investors that he was the owner of those
28

1 | estates. Gracey also rented high-end automobiles, including a Ferrari, a Maybach, a
2 | Rolls Royce, and a Lamborghini, and represented those vehicles as his own.

3 | 7. As set forth in the Complaint, the evidence establishes that Gracey
4 | identified people with money to invest (“victims”), and told the victims that Gracey had
5 | special access to “pre-IPO” shares of a company that Gracey said would go public
6 | through an initial public offering (“IPO”) in the near future. Gracey told the victims that
7 | the value of the shares would increase by a factor of 50 or more when the company
8 | conducted an initial public offering in the near future.

9 | 8. Between mid-2017 and May 2018, Gracey told victims that the company
10 | whose stock he was selling would be the product of a merger between three government
11 | contracting companies called “DXC,” “Keypoint,” and “Vencore.” While Gracey
12 | initially told victims that the name of the soon-to-be-formed company was secret, he later
13 | told them that the name of the company was “Perspecta.” DXC, Keypoint and Vencore
14 | are legitimate companies, and in fact jointly entered into a transaction creating a company
15 | called Perspecta. However, representatives of these companies have told the government
16 | that Gracey had no relationship to any of the companies, owned no Perspecta stock, and
17 | no authority to sell it.

18 | 9. Based on these representations, victims “purchased” Perspecta shares from
19 | Gracey for approximately \$4 million. However, instead of transferring the promised
20 | securities, Gracey simply stole the victims’ money, and used much of it to fund his
21 | lifestyle, including the rentals of high-end estates and automobiles. The majority of
22 | Gracey’s victims were residents of the Seattle, Washington and Los Angeles, California
23 | metropolitan areas.

24 | 10. On May 10, 2018, the Securities and Exchange Commission (“SEC”) filed
25 | a civil complaint in the Central District of California alleging that Gracey engaged in
26 | securities fraud in violation of the Securities Act of 1933 and the Securities Exchange Act
27 | of 1934. *See* Central District of California Cause No. CV18-3872AB (the “SEC
28 | Action”). On May 10, 2018, United States District Judge Andre Birotte issued a

1 temporary restraining order that, *inter alia*, enjoined Gracey from selling securities. SEC
2 Action Dkt. 4. On September 27, 2018, Judge Birotte granted the SEC's Motion for
3 Default Judgment. SEC Action Dkt. 23. On November 5, 2018, Judge Birotte ordered a
4 permanent injunction prohibiting Gracey from selling securities. *Id.* Judge Birotte also
5 ordered Gracey to disgorge \$4,403,500, finding that the "SEC submitted evidence that
6 Gracey had obtained \$4,403,500 through his wrongful conduct." *Id.* Finally, Judge
7 Birotte ordered an additional civil penalty of \$4,403,500. *Id.*

8 11. On November 9, 2018, I endorsed a Complaint in this Court charging
9 Gracey with wire fraud for the scheme described above. The Court issued a warrant for
10 Gracey's arrest, as well as a warrant to search an email account that Gracey used to
11 communicate with victims (the "Tijor24 Gmail Account"). On December 20, 2018, FBI
12 agents arrested Gracey outside of the Airport Courthouse in Los Angeles, California.

13 12. On January 3, 2019, a Seattle grand jury returned an indictment charging
14 Gracey with ten counts of wire fraud. The indictment charges Gracey with the conduct
15 described above, as well as the additional fraudulent stock offering described below.

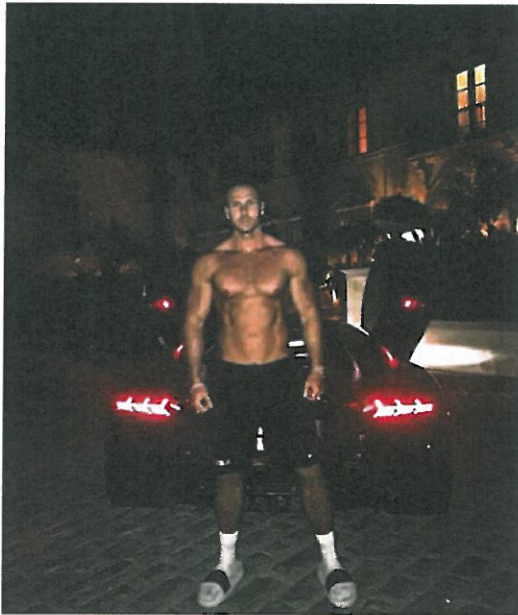
16 **B. Evidence of Additional Fraud by Gracey**

17 13. Following the issuance of the arrest and search warrant, I discovered that
18 Gracey had continued to engage in fraud even after the SEC obtained a temporary
19 restraining order against Gracey.

20 14. Specifically, my review of the Tijor24 Gmail Account revealed
21 communications between Gracey and a Washington resident ("Victim 1") about Gracey
22 selling securities to Victim 1. I interviewed Victim 1 on December 28, 2018. Victim 1
23 had met Gracey years earlier when Victim 1 had worked with Gracey's father, and
24 Victim 1 had employed Gracey as Victim 1's personal trainer. Victim 1 reported that, in
25 June 2018 (following the entry of the temporary restraining order in the SEC action),
26 Gracey contacted Victim 1 and told him that Gracey had an investment opportunity.
27 Gracey explained that there was an initial public offering that was being planned as a
28 joint venture by two companies called Beam Therapeutics and Editas Medicine. Gracey

1 explained that he had access to pre-IPO shares of the company, which he could sell for \$1
2 per share. Gracey said that the value of the shares would increase to \$50 per share when
3 the company went public. Victim 1 stated that he personally invested \$400,000 with
4 Gracey. In addition, Victim 1 contacted other investors he knew and told them about the
5 opportunity, and these other investors invested directly with Gracey between June and
6 November 2018.

7 15. Victim 1 provided documents, including text messages, bank records and
8 share purchase agreements, corroborating his statements. The text messages contained
9 numerous pictures and statements in which Gracey presented himself as an extremely
10 wealthy and successful investor. For example, on June 3, 2018, Gracey texted Victim 1
11 the photograph shown below, which depicts Gracey standing in front of a luxury sports
12 car, which itself is parked in front of the Beverly Hills mansion that Gracey claimed to
13 own:



24 In another text message sent the same day, Gracey told Victim 1 that “you don’t need an
25 MBA to do this, you need to know the right people to put the deal together. We’re
26 finalizing series A round funding of something called Beam Therapeutics, a spinoff from
27 Editas Medicine.” Gracey goes on to state that the company “will easily trade at \$50 per
28

1 share on its IPO. 50X roi.” I know from my training and experience that the initials
2 “roi” are used in the investment context to mean “return on investment.”

3 16. As with Perspecta (the company that was the subject of Gracey’s previous
4 fraudulent offering), Beam Therapeutics is a genuine corporation. I interviewed the
5 Chief Executive Officer and the interim Chief Financial Officer of Beam Therapeutics.
6 Both confirmed that Keenan Gracey does not own any shares of the company and has no
7 relationship to it.

8 17. Gracey texted Victim 1 many documents associated with the fraud. For
9 example, on July 23, 2018, Gracey texted Victim 1 a bank statement, which I know to be
10 falsified, purporting to show that the balance on Gracey’s checking account exceeded
11 \$117,000,000. On November 1, 2018, Gracey texted Victim 1 a document from
12 Deutsche Bank which, Gracey claimed, showed that a company owned by Gracey had
13 just received a transfer of €500,000,000 euros. On November 2, 2018, Gracey texted
14 Victim 1 a document purporting to be a stock certificate reflecting that Gracey owned 10
15 million shares of Beam Therapeutics stock. This certificate is similar to documents that
16 Gracey created in connection with his original fraud scheme. The Beam Therapeutics
17 representatives referenced above confirmed that this certificate is fraudulent.

18 18. In addition, Victim 1 provided the FBI with 18 fraudulent signed “Share
19 Purchase Agreements” dated between June and November 2018. The agreements are
20 nearly identical to the agreements used in Gracey’s fraudulent promotion of Perspecta
21 shares, and purport to sell victims shares of stock in a company to be created by Beam
22 Therapeutics and Editas Medicine. Some of the agreements provided by Victim 1 refer
23 to the company to be created as “Moderna.” The documents memorialize that Gracey
24 collected more than \$2 million from victims after the SEC obtained an order forbidding
25 Gracey from selling securities. In addition, two versions of this agreement were retrieved
26 in the search of the Tijor24 Gmail Account.

27 19. The Tijor24 Gmail Account contains further evidence of additional fraud
28 that the FBI is continuing to investigate. For example, the Tijor24 Gmail Account also

1 contains numerous emails and attachments from September and October 2018 relating to
2 a purported joint venture agreement between "Strider Enterprises," and another
3 individual ("Person 1"). The document identifies "Xander Gracey" as the director of
4 Strider Enterprises. According to the document, Strider and Person 1 will contribute a
5 total of €500 million euros to the joint venture, which will be deposited into an HSBC
6 account known to be controlled by Gracey.

7 20. The Tijor24 Gmail Account also contains numerous emails in October 2018
8 relating to a supposed British company called Blixton Capital Limited ("Blixton"). The
9 documents indicate that HSBC Holdings PLC issued a bond valued at €1 billion euros in
10 favor of Blixton. Email correspondence between the Tijor24 Gmail Account and First
11 Republic Bank in Los Angeles indicates that Gracey submitted copies of the purported
12 bond to First Republic, and that Gracey and Person 1 subsequently arranged to meet with
13 bank representatives about the bond. Internal First Bank Republic documents indicate
14 that the bank identified the transaction as fraudulent and cancelled the meeting.

15 **C. The Subject Account**

16 21. My review of the Tijor24 Gmail Account has produced evidence that
17 Gracey created and used the Subject Account to continue his fraud following the entry of
18 the SEC temporary restraining order in May 2018. The Tijor24 Gmail Account contains
19 an email from the Google "Gmail Team" sent on May 30, 2018. The email says that
20 "your Gmail address, xanderg2488@gmail.com [the address of the Subject Account] has
21 been created." I know from my training and experience that, when a user creates a Gmail
22 account, the user is prompted to enter the email address of an existing account. When the
23 new account is created, Google will send a notice, such as the May 30, 2018 email, to the
24 existing account to notify the user that the account has been created.

25 22. The Tijor24 Gmail Account also contains an email sent from the Subject
26 Account to the Tijor24 Gmail Account on May 30, 2018. The body of the email simply
27 states "hi." Notably, the name of the sender for the Subject Account appears as "Xander
28 Gracey." "Xander" is a derivation of Keenan Gracey's middle name, which is

Alexander. My review of other case materials, such as investment agreements and communications with investors, indicates that Gracey began using the name "Xander Gracey" at times following the filing of the SEC lawsuit against "Keenan Gracey." I know from my training and experience that persons who have been publicly exposed as committing fraud will sometimes use alias names to prevent new victims from discovering their past fraudulent transactions. Gracey's creation of a new account that uses an alias (Xander Gracey) as the sender's name may have been intended to serve this purpose.

23. The Tijor24 Gmail search warrant return shows that Gracey used the Subject account to communicate with potential victims. For example, the Tijor24 Gmail Account contains an email string between the Subject Account and a potential investor. The string begins with a May 30, 2018 email from the Subject Account in which Gracey states that "email is always the best way to reach me, especially in Beverly Hills where the reception is so spotty." Gracey, using the Subject Account, invites the investor to "lunch on Friday at our estate in Beverly Hills" and says that "I think you may be interested in what we are moving on right now in the gene editing world and how we intend to take this public through an IPO, as we have already done in the past through CRiSPR Cas9 IPO via Editas Medicine." The string contains several more emails between Gracey (using the Subject Account) and the potential investor in which the two arrange a meeting. Gracey then sends an additional email thanking the investor for the meeting and providing more information about his offer, including that the investment will produce a "50x roi." Gracey forwarded this string from the Subject Account to the Tijor24 Gmail Account, which is why the email was retrieved as part of the search of the Tijor24 Gmail Account.

24. The Tijor24 Gmail Account search warrant return also shows that Gracey sent numerous fraudulent documents from the Subject Account to the Tijor24 Gmail Account. For example, on June 2, 2018, an email with the subject line "xander.docx" was sent from the Subject Account to the Tijor24 Gmail Account. Attached to the email

1 was a model "Share Purchase Agreement" in Microsoft Word format. The model
2 agreement is nearly identical to those discussed above and provided to victims of the
3 scheme. This version states that "Xander Gracey" is the owner of shares of a company
4 produced by the merger of parts of Beam Therapeutics and Editas Medicine. The
5 document contains blank spaces to add the name of the purchaser, the number of shares,
6 and the purchase price. Gracey resent the same document from the Subject Account to
7 the Tijor24 Gmail Account on June 14, 2018.

8 25. On October 21, 2018, an email with the subject line "requested
9 documentation" was sent from the Subject Account to a relative of Keenan Gracey with a
10 copy to the Tijor24 Gmail Account. Attached to the email are several documents relating
11 to Blixton Capital Management, including a corporate resolution, a power of attorney,
12 and a document that appears to reflect a note in favor of Blixton in the amount of
13 €1,500,000,000 euros. As discussed above, Gracey later submitted similar documents to
14 First Republic Bank in Los Angeles, California. On November 2, 2018, the Subject
15 Account sent another email to the Tijor24 Gmail Account attaching additional legal,
16 corporate and financial documents relating to Blixton. Among the attachments was a
17 copy of the \$1 billion note that Gracey submitted to First Republic Bank.

18 26. On November 2, 2018, the Subject Account sent an email titled "Document
19 (1).docx" to the Tijor24 Gmail Account. The attachment is a Microsoft Word document
20 that purports to be an unsigned stock certificate memorializing that Keenan Gracey owns
21 10 million shares of Beam Therapeutics stock. This version of the document is unsigned.
22 As discussed above, the same day, Gracey sent Victim 1 a signed copy of this document
23 in connection with his fraudulent offering to Victim 1 and investors recruited by Victim
24 1.

25 27. All of these emails establish probable cause to believe that Gracey used the
26 Subject Account in furtherance of his fraud scheme, and that the account may contain
27 evidence of his violations of Title 18, United States Code, Section 1343.

BACKGROUND CONCERNING EMAIL

26. In my training and experience, I have learned that Google provides a variety of on-line services, including electronic mail ("email") access, to the public. Google allows subscribers to obtain email accounts under different domain names, including "gmail.com" and "googlemail.com."¹ Subscribers obtain an account by registering with Google. During the registration process, Google asks subscribers to provide basic personal information. Therefore, the computers of Google are likely to contain stored electronic communications (including retrieved and unretrieved email for Google subscribers) and information concerning subscribers and their use of Google services, such as account access information, email transaction information, and account application information. In my training and experience, such information may constitute evidence of the crimes under investigation because the information can be used to identify the account's user or users. Based on my training and my experience, I know that, even if subscribers insert false information to conceal their identity, this information often provides clues to their identity, location, or illicit activities, and can provide evidence of the subscriber's intent to conceal his or her identity.

27. A Google email subscriber can also store with the provider files in addition to emails, such as address books, contact or buddy lists, calendar data, pictures (other than ones attached to emails), and other files, on servers maintained and/or owned by Google. In my training and experience, evidence of who was using an email account may be found in address books, contact or buddy lists, email in the account, and attachments to emails, including pictures and files.

28. In my training and experience, in some cases, email account users will communicate directly with an email service provider about issues relating to the account, such as technical problems, billing inquiries, or complaints from other users. Email

¹ While Google is most commonly known to issue email addresses for the "@gmail.com" domain, it has also issued addresses for the "@googlemail.com" domain.

1 providers typically retain records about such communications, including records of
2 contacts between the user and the provider's support services, as well as records of any
3 actions taken by the provider or user as a result of the communications. In my training
4 and experience, such information may constitute evidence of the crimes under
5 investigation because the information can be used to identify the account's user or users.

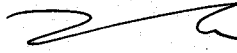
6 29. Information stored in connection with an email account may provide crucial
7 evidence of the "who, what, why, when, where, and how" of the criminal conduct under
8 investigation, thus enabling the United States to establish and prove each element or
9 alternatively, to exclude the innocent from further suspicion. In my training and
10 experience, the information stored in connection with an email account can indicate who
11 has used or controlled the account. This "user attribution" evidence is analogous to the
12 search for "indicia of occupancy" while executing a search warrant at a residence. For
13 example, email communications, contacts lists, and images sent (and the data associated
14 with the foregoing, such as date and time) may indicate who used or controlled the
15 account at a relevant time.

16 30. Information maintained by the email provider can show how and when the
17 account was accessed or used. For example, email providers typically log the Internet
18 Protocol (IP) addresses from which users access the email account, along with the time
19 and date of that access. By determining the physical location associated with the logged
20 IP addresses, investigators can understand the chronological and geographic context of
21 the email account access and use relating to the crime under investigation. This
22 geographic and timeline information may tend to either inculcate or exculpate the
23 account owner. Additionally, information stored at the user's account may further
24 indicate the geographic location of the account user at a particular time (e.g., location
25 information integrated into an image or video sent via email).

26 CONCLUSION

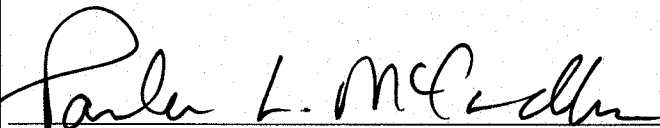
27 31. Based on the foregoing, I request that the Court issue the proposed search
28 warrant. Because the warrant will be served on Google, who will then compile the

1 requested records at a time convenient to it, reasonable cause exists to permit the
2 execution of the requested warrant at any time in the day or night.

3
4 

5 MILAS HOWE
6 Special Agent
7 Federal Bureau of Investigation

8 SUBSCRIBED AND SWORN before me on January 14, 2018.

9
10 

11 PAULA L. MCCANDLIS
12 United States Magistrate Judge

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the Google account with the assigned email address xanderg2488@gmail.com. The information is stored at premises owned, maintained, controlled, or operated by Google LLC, a company headquartered at 1600 Amphitheater Parkway, Mountain View, CA 94043.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Google LLC (the "Provider")

To the extent that the information described in Attachment A is within the possession, custody, or control of the Provider, regardless of whether such information is located within or outside of the United States, and including any emails, records, files, logs, or information that has been deleted but is still available to the Provider, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f) on September 11, 2018, the Provider is required to disclose the following information to the government for the account identified in Attachment A:

a. For the period May 30, 2018 to the present, the contents of all emails associated with the account, including stored or preserved copies of emails sent to and from the account, draft emails, the source and destination addresses associated with each email, and all attachments associated with each email, along with the date and time at which each email was sent, and the size and length of each email;

b. All subscriber records or other information regarding the identification of the account user, to include: 1) names, email addresses, and screen names; 2) physical addresses; 3) records of session times and durations; 4) length of service (including start date) and types of services utilized; 5) telephone or instrument number or other subscriber number or identity, including any temporarily assigned network address such as internet protocol address, media access card addresses, or any other unique device identifiers recorded by Google in relation to the account; 6) account log files (login IP address, account activation IP address, and IP address history); 7) detailed billing records/logs; 8) means and source of payment; and 9) lists of all linked or related accounts;

c. Information reflecting the types of Google services utilized by the user of the account;

d. All records or other information stored by any individual using the account, including address books, contact and buddy lists, Google Calendar content, Google Drive content; Google Photos content; and Google Web & Activity content; and

e. All account history, including any records of communications between Google and any other person about issues relating to the accounts, such as technical problems, billing inquiries, or complaints from other users about the specified account. This is to include records of contacts between the subscriber and the provider's support services, as well as records of any actions taken by the provider or subscriber in connection with the service.

The Provider is hereby ordered to disclose the above information to the government within 14 days of the service of this warrant.

II. Information to be seized by the government

Upon receipt of the information described in Section I, the government shall review the production and may seize the following material:

All information described above in Section I that constitutes evidence and instrumentalities of violations of Title 18, United States Code, Section 1343, those violations involving Keenan Gracey and occurring after January 1, 2016, including communications or information pertaining to the following matters:

a. Content referring or relating to any security, loan, or other investment, including material relating to the purchase, sale, or offer for sale of any security or other investment;

b. Content referring or relating to any of the following business entities:

- i. Perspecta, Inc.;
- ii. DXC Technology Company;
- iii. Keypointe Government Solutions;
- iv. Vencore, Inc.;
- v. Beam Therapeutics, Inc.
- vi. Editas Medicine;
- vii. Moderna;
- viii. Blixton Capital, Ltd; or
- ix. Strider Enterprises.

c. Any communication with any person to whom Gracey is known to have sold or offered to sell any security or other investment, as well as transactional records memorializing those communications;

1 d. Statements by Gracey about his or his family's purported wealth,
2 background, education, investment experience, and ownership of, or access to, securities;

3 e. Content evidencing Gracey's actual wealth or absence thereof,
4 background, education, investment experience, and ownership of, or access to, securities;

5 f. Photographs of automobiles, residences, or financial or legal
6 documents;

7 g. Content evidencing the actual use or disposition of any funds
8 collected by Gracey from any person in connection with the sale or offer for sale of any
9 investment;

10 h. Content evidencing how and when the email account was accessed
11 or used, to determine the geographic and chronological context of account access, use,
12 and events relating to the crime under investigation and to the email account owner; and

13 i. Content that serves to identify any person who uses or accesses or
14 who exercises in any way any dominion or control over the Subject Account.
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC RECORDS PURSUANT
TO FEDERAL RULES OF EVIDENCE 902(11) AND 902(13)**

I, _____, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by Google, and my title is _____. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Google. The attached records consist of

_____ **[GENERALLY DESCRIBE RECORDS (pages/CDs/megabytes)].**

I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Google, and they were made by Google as a regular practice; and

b. such records were generated by Google electronic process or system that produces an accurate result, to wit:

1. the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Google in a manner to ensure that they are true duplicates of the original records; and

2. the process or system is regularly verified by Google, and at all times pertinent to the records certified here the process and system functioned properly and normally.

1 I further state that this certification is intended to satisfy Rules 902(11) and
2 902(13) of the Federal Rules of Evidence.

3
4
5 _____
6 Date

Signature
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Appendix 1

The Honorable Paula L. McCandlis

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

KEENAN A. GRACEY a/k/a KEENEN A.
GRACEY,
Defendant.

CASE NO.

COMPLAINT for VIOLATION

Title 18 U.S.C. § 1343

BEFORE, the Honorable Paula L. McCandlis, United States Magistrate Judge,
U.S. Courthouse, Seattle, Washington.

The undersigned complainant, being duly sworn, states:

COUNT ONE
(Wire Fraud)

A. The Scheme to Defraud

1. Beginning no later than in or about June 2016, and continuing until about
May 2018, at Clyde Hill, within the Western District of Washington, and elsewhere,
KEENAN A. GRACEY, a/k/a KEENEN A. GRACEY ("GRACEY"), devised and
intended to devise a scheme and artifice to defraud, and to obtain money and property by
means of materially false and fraudulent pretenses, representations and promises.

United States v. Keenan Gracey
Complaint-1

UNITED STATES ATTORNEY
700 STEWART STREET
SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 2. The essence of the scheme and artifice to defraud was for GRACEY to
2 falsely represent himself as a wealthy businessman who could offer investors special
3 access to “pre-IPO” stock in a soon-to-be-formed company, which, GRACEY promised,
4 would produce returns of up to 60 times the original investment when the company
5 conducted an initial public offering. GRACEY collected millions of dollars from victims
6 by purporting to “sell” them this stock, when in fact GRACEY did not own or have
7 access to any such stock and had no authority to sell it.

8 **B. Manner and Means**

9 GRACEY operated in the following manner, and employed the following means,
10 to accomplish his scheme and artifice to defraud:

11 3. GRACEY falsely presented himself to potential investors as a successful
12 businessman from an extremely wealthy English family. GRACEY told investors that
13 GRACEY’s great-grandfather was the “lord commander of the British empire” and a co-
14 founder of both the General Dynamics Corporation and Lloyd’s of London. GRACEY
15 falsely told investors GRACEY had graduated from the London School of Economics;
16 had earned a Master’s Degree in finance from Oxford University; and had become a
17 successful businessman with hundreds of millions of dollars in investments.

18 4. GRACEY used deceptive means to create the appearance that he was
19 indeed a wealthy investor. GRACEY rented multi-million dollar estates in Beverly Hills,
20 and San Diego, California; and Clyde Hill and Newcastle, Washington. GRACEY
21 entertained potential investors at these estates and represented himself as the owner.
22 Similarly, GRACEY rented luxury automobiles and told investors that he was the owner
23 of those cars. GRACEY falsified a bank statement to make it appear that he had
24 hundreds of millions of dollars of cash on hand, and showed the bank statement to
25 potential investors as evidence of his own wealth.

26 5. GRACEY identified people (referenced hereafter as “victims”) with money
27 to invest and/or relationships with others who had money to invest. GRACEY offered
28 the victims what GRACEY characterized as a “once in a lifetime” business opportunity.

1 GRACEY said this opportunity involved purchasing “pre-IPO” shares in a company that,
2 GRACEY represented, had planned an initial public offering (“IPO”). GRACEY said
3 that, at the time of the IPO, the investors would be able to sell their shares at a profit of
4 50 to 60 times the initial investment. Initially (during 2016 and part of 2017), GRACEY
5 described the company as virtual reality startup, and claimed to sit on the company’s
6 board of directors.

7 6. Beginning in the fall of 2017, GRACEY told victims that the “pre-IPO”
8 shares he was offering were shares in a new business entity that would be formed by the
9 merger of three government contracting companies. GRACEY identified the merging
10 companies as “DXC,” “KeyPoint,” and “Vencore,” and the new entity to be formed as
11 “Perspecta.” GRACEY provided victims with a copy of a DXC-created presentation,
12 which is available on DXC’s website, describing the planned transaction and its
13 anticipated business benefits. GRACEY provided some potential victims with phony
14 share purchase agreements, which purported to convey the Perspecta shares to the buyer.

15 7. While it was true that DXC, KeyPoint, and Vencore were legitimate
16 businesses planning a merger, GRACEY had no connection to any of these companies.
17 GRACEY did not own any securities related to Perspecta, DXC, KeyPoint, or Vencore,
18 and therefore could not convey any of the securities that he purported to offer for sale.

19 8. GRACEY collected millions of dollars in “investments” from victims who
20 believed they were purchasing the pre-IPO securities described by GRACEY. In some
21 cases, at GRACEY’s direction, victims provided the money to GRACEY by interstate
22 wire transmission, including transmissions originating in Washington. In other cases,
23 GRACEY requested that the investors provide GRACEY with the investment money in
24 cash.

25 9. When some of the victims became suspicious of GRACEY and demanded
26 that GRACEY return their investment principal, GRACEY attempted to lull the investors
27 by providing false reasons why he could not return the money. For example, GRACEY
28 told victims that returning the money would constitute securities fraud or would

1 otherwise raise suspicions from the government. When victims persisted in demanding
2 their money back, GRACEY prepared and executed loan agreements in which he
3 promised to repay the money. When GRACEY signed these agreements, GRACEY had
4 no intention of making the promised payments.

5 **C. Execution of the Scheme to Defraud**

6 10. On or about December 30, 2017 at Bellevue, within the Western District of
7 Washington, and elsewhere, for the purpose of executing and attempting to execute this
8 scheme and artifice to defraud, KEENAN GRACEY, and others known and unknown to
9 the complainant, did knowingly transmit and cause to be transmitted by wire
10 communication in interstate and foreign commerce, writings, signs, signals, pictures and
11 sounds, in that KEENAN GRACEY caused Victim 1 to initiate an interstate wire
12 transmission in the form of an \$80,000 wire transfer originating in Washington and
13 terminating in California.

14 All in violation of Title 18, United States Code, Section 1343 and Section 2.

15 ***

16 And the complainant states that this Complaint is based on the following
17 information:

18 I, Special Agent Milas Howe, being first duly sworn on oath, depose and say:

19 **AFFIANT BACKGROUND AND SCOPE OF AFFIDAVIT**

20 1. I am a Special Agent with the Federal Bureau of Investigation (FBI),
21 assigned to the White Collar Crime Squad of the Seattle, Washington Headquarters Field
22 Office. I have worked with the FBI since May 2017. I am responsible for investigating
23 violations of federal statutes governing various types of white collar crime, including
24 wire fraud, mail fraud, bank fraud, securities fraud, money laundering, and theft of
25 government and public money. Prior to working for the FBI, I spent over ten years in the
26 accounting industry working as both an internal and external auditor. I am a licensed
27
28

1 Certified Public Accountant, Certified Fraud Examiner, and Certified Information
2 Systems Auditor.

3 2. The FBI has been investigating allegations that KEENAN GRACEY a/k/a
4 KEENEN GRACEY ("GRACEY") defrauded investors out of millions of dollars
5 between 2016 and 2018. This matter came to the FBI's attention through a referral from
6 the Securities and Exchange Commission ("SEC"). My investigation has included
7 witness interviews, the review of documents, including financial records, email and text
8 communications and other documents, and of materials prepared and obtained by the
9 SEC in its investigation of GRACEY. The information set forth in this Affidavit is not
10 intended to detail each and every fact and circumstance of the investigation or all
11 information known to me or the investigative participants. Rather, this Affidavit is
12 intended to present the facts relevant to the issue of whether probable cause exists to
13 believe that GRACEY committed the crime alleged above.

14 **EVIDENCE OF THE CRIMINAL OFFENSE**

15 **A. The SEC Action**

16 3. On May 10, 2018, the SEC filed a complaint in the Central District of
17 California alleging that GRACEY engaged in securities fraud in violation of the
18 Securities Act of 1933 and the Securities Exchange Act of 1934. *See* Central District of
19 California Cause No. CV18-3872AB (the "SEC Action").

20 4. The SEC's Complaint alleged that GRACEY falsely portrayed himself as a
21 wealthy investor with special access to "pre-IPO" shares of a company to be formed
22 under the name "Perspecta, Inc." The SEC Complaint alleged that GRACEY had taken
23 over \$2 million from investors, purportedly in exchange for the Perspecta shares. In fact,
24 the Complaint alleged, GRACEY was not a wealthy investor; had no relationship with
25 Perspecta or any of its affiliate companies; and did not own any of its stock. In a Motion
26 for a Temporary Restraining Order accompanying the Complaint, the SEC alleged that
27 "in short, Gracey under the guise of having access to valuable pre-IPO shares, is simply
28 stealing money from investors." SEC Action Dkt. 6 at 1.

1 5. On May 10, 2018, United States District Judge Andre Birotte issued a
2 temporary restraining order that, *inter alia*, enjoined GRACEY from selling securities,
3 imposed a freeze on Gracey's assets, and ordered GRACEY to produce a full accounting
4 of the use of investor funds. SEC Action Dkt. 4. On May 23, 2018, Judge Birotte
5 entered a preliminary injunction extending the term of this relief. SEC Action Dkt. 13.
6 On September 27, 2018, Judge Birotte granted the SEC's Motion for Default Judgment.
7 SEC Action Dkt. 23. Judge Birotte ordered a permanent injunction prohibiting GRACEY
8 from selling securities. *Id.* Judge Birotte also ordered GRACEY to disgorge \$4,403,500,
9 finding that the "SEC submitted evidence that Gracey had obtained \$4,403,500 through
10 his wrongful conduct." *Id.* Finally, Judge Birotte ordered an additional civil penalty of
11 \$4,403,500. *Id.*

12 **B. Witness Statements**

13 6. I have reviewed SEC records memorializing the interviews of
14 approximately 25 victims conducted by the SEC. I have also reviewed the sworn
15 statements of four victims that were filed in the SEC Action. In addition, I have
16 interviewed some of the same victims interviewed by the SEC.

17 7. These victims generally related highly similar experiences with GRACEY.
18 In general, the victims recounted that GRACEY presented himself to them as a wealthy
19 investor from an extremely wealthy British family. GRACEY told victims that his
20 relatives had founded major companies such as Lloyd's of London and General
21 Dynamics. The victims said that GRACEY drove expensive cars, to include brands such
22 as Bentley, Ferrari, Maybach and Rolls Royce. GRACEY invited them to visit him at
23 estates in Clyde Hill and Newcastle, Washington, and Beverly Hills and San Diego,
24 California. GRACEY represented himself as the owner of these estates. Some victims
25 reported that GRACEY showed them images of a bank statement purportedly showing
26 that GRACEY had hundreds of millions of dollars in the bank.

27 8. The victims recounted that GRACEY offered to sell them what GRACEY
28 characterized as "pre-IPO" shares in a company that, GRACEY said, would be

1 conducting an initial public offering (“IPO”) in the near future. The victims recounted
2 that GRACEY told them GRACEY had special access to the pre-IPO shares as a result of
3 his or his family’s connection with the company.

4 9. Victims who dealt with GRACEY in 2016 and early 2017 reported that
5 GRACEY described the company as a virtual reality company. However, victims
6 reported that, beginning in 2017, GRACEY identified the company as a newly-formed
7 government-contracting company that would be created through the merger of three
8 existing companies known as DXC Technology Company (“DXC”), KeyPoint
9 Government Solutions (“KeyPoint”) and Vencore, Inc. (“Vencore”). Victims recounted
10 that GRACEY told them his family had a large holding in the parent company of
11 KeyPoint and Vencore. As a result, GRACEY told victims, GRACEY had purchased a
12 large stake in the new entity, which would be called “Perspecta.” GRACEY offered to
13 sell the victims “pre-IPO” shares of Perspecta stock for \$1 per share. GRACEY told the
14 victims they would be able to redeem their shares for \$50 or \$60 after the IPO.

15 10. Victims reported making payments to GRACEY in amounts ranging from
16 thousands of dollars to hundreds of thousands of dollars based on GRACEY’s
17 representations that they were purchasing stock in the company GRACEY described.
18 Some victims stated that, at GRACEY’s direction, they made these payments to
19 GRACEY in cash. Others reported paying via wire transfer. Some victims reported that
20 GRACEY provided them with stock purchase agreements purporting to memorialize the
21 transactions, while others reported receiving no paperwork. Victims reported that
22 GRACEY told them that a nondisclosure agreement prevented him from sharing
23 extensive information about the company.

24 **C. Documents Provided by Victims**

25 11. ***Emails:*** Many of the victims provided the FBI and/or the SEC with
26 documents corroborating their statements. Included among these were messages the
27 victims received from GRACEY’s email account, which has an address of
28

1 | tijor24@googlemail.com. Many of the email messages discuss GRACEY's supposed
2 | sale of pre-IPO stock to victims. Following are a few examples of the emails:

- 3 | • A February 17, 2017, email to a victim (referenced hereafter as "Victim
4 | 2") from GRACEY's account states that "my great grandfather was the
5 | lord commander of the British empire" and "co-founded General
6 | Dynamics." GRACEY stated that "the current secretary of defense, Jim
7 | Mattis, was on the board and worked directly for and with my
8 | grandfather." Further, the "CEO of DXC corporation used to work for
9 | my father and grandfather at Missy's in London." The email states that
10 | GRACEY had "purchased \$100 million of [pre-IPO Perspecta] stock on
11 | margin to be sold to accredited and non-accredited investors above and
12 | beyond the legal limit of my \$150 million." Financial records show that
13 | Victim 2 transferred \$25,000 to GRACEY on February 20, 2018.
- 14 | • A January 27, 2017, email from GRACEY's email account to another
15 | victim (referenced hereafter as "Victim 3") states that the email "serves
16 | as documentation for an agreement between Keenan Gracey and
17 | [Victim 3]. The two named individuals have made an agreement that
18 | [Victim 3] will pay \$100,000 (U.S. currency) to buy Series A stock at
19 | \$1 share, in a private company with NDA chartered code name
20 | NewCorp that intends to go public with an IPO, in 2018 through an
21 | accredited investment consortium." Bank records show that Victim 3
22 | transferred \$100,000 to GRACEY between December 6, 2017 and
23 | January 12, 2018.
- 24 | • In a December 30, 2017, email to the victim identified above as Victim
25 | 1, GRACEY responded to concerns that Victim 1's attorney had raised
26 | about the proposed stock sales. In response to a question by the
27 | attorney about why no offering materials had been provided, GRACEY
28 | stated that he could not provide a private placement memorandum for
the proposed stock sale because "it is protected by an internal NDA for
accredited investors only." GRACEY's email states that Victim 1's
attorney was providing "misinformation" and "adding to the confusion."
It continued that "my family and I specialize in this and have done for
generations. This is what we do. . . I can assure you that everything we
touch is handled in a completely legal manner." Bank records show that
Victim 1 and his family members provided GRACEY with
approximately \$575,000 between December 30, 2017 and May 15,
2018.

12. **Text Messages:** Victims also provided copies of text messages they had received from GRACEY. Following are a few examples of these messages:

- A message from GRACEY to a victim (referenced hereafter as “Victim 4”) states that “we have \$150 million invested into the private companies (but actually own them fully through veritas capital which my grandfather owns) at \$1 per share. When this goes public it will be worth \$60 per share upon opening. That’s 60x return. This is what we do babe and it’s what I specialize in as well. I care about you, and I feel and know I could have done better for us so if you’re interested in me getting you in I’ll add you to my end of the investment.” Bank records show that Victim 4 transferred \$34,000 to GRACEY between February 16, 2018 and March 2, 2018.
- In a message to a victim (referenced hereafter as “Victim 5”), GRACEY states that “I think you will recall that as I explained this will be a 5 company merger, including DXC delisting from the stock market.” In other messages with Victim 5, GRACEY attached photos of a Beverly Hills estate as well as high-end sports cars, explaining that “I’ve attached . . . two videos of my family’s estate here so you can understand the surrounding of the area and how most of my neighbors are billionaires.” Bank records show that Victim 5 transferred \$20,000 to GRACEY on October 23, 2017.
- In another text message, GRACEY and another victim (referenced hereafter as “Victim 6”) discuss Victim 6 providing \$500,000 to GRACEY. GRACEY suggests that Victim 6 “confidently approach others you trust,” and asks the Victim 6 to “let me know how things progress towards the \$1 mill and \$2 mill mark.” Bank records show Victim 6 and his friends and family transferred \$745,000 to GRACEY between January 11, 2018 and March 26, 2018.

13. **Other Records:** In addition to the email and text messages, victims also provided numerous other records corroborating their statements. For example, victims provided copies of “Share Purchase Agreements” between GRACEY and the victims purporting to memorialize the sale of stock by GRACEY to the victims. The Share Purchase Agreements state that GRACEY “is the owner of record of an aggregate of Series A shares in a private company with NDA chartered name NewCorp, which is the

1 product of the merger of parts of DXC, Vencore, Keypoint, and any other businesses
2 involved (the 'Corporation') that intends to go public with an IPO in 2018."

3 14. Some victims provided copies of a presentation they received from
4 GRACEY describing the benefits of the proposed merger between DXC, Vencore and
5 KeyPoint. This document was publicly available on DXC's investor relations page.

6 15. Victims also provided documents they received from GRACEY that
7 GRACEY used to evidence GRACEY's supposed wealth. For example, victims
8 provided the government with a photograph GRACEY gave them purportedly depicting a
9 stock certificate reflecting GRACEY's ownership of 65 million shares of Vencore stock.
10 Victims also produced photographs GRACEY sent them of what appeared to be
11 GRACEY's JP Morgan Chase Bank checking account statement. One victim provided a
12 version of this statement reflecting a cash balance of \$741,009,998 at the end of March
13 2018. Another version provided by a different victim reflects a cash balance of
14 \$117,001,770 for the same account at the same time. I have reviewed records provided
15 by JP Morgan Chase for GRACEY's checking account for this period. According to
16 those records, the actual account balance as of March 30, 2018 was \$7,500.01.

17 **D. Evidence that GRACEY's Solicitations Were Fraudulent**

18 16. I have also reviewed extensive evidence establishing that GRACEY's
19 investor solicitations were fraudulent. I have reviewed sworn statements of
20 representatives from DXC, KeyPoint and Vencore—the companies involved in the
21 Perspecta merger. Each representative stated that he or she reviewed his or her respective
22 company's relevant business records and determined that neither GRACEY nor his father
23 had any ownership interest in, or other affiliation with his or her respective company. In
24 addition, the statement from the DXC representative states that, as of April 30, 2018,
25 Perspecta had not issued any stock—making GRACEY's claim of owning hundreds of
26 millions of shares impossible.

1 17. I have also investigated GRACEY's claim to be a member of a British
2 family with extensive financial holdings. Public records establish that GRACEY is
3 actually a Canadian citizen who has lived in the United States since at least 2006.

4 18. An SEC attorney interviewed GRACEY's wife. GRACEY's wife reported
5 that she met GRACEY in 2011 and married him in 2014. GRACEY's wife told the SEC
6 attorney that GRACEY had presented himself to her as a professional athlete from the
7 United Kingdom who was new to the United States. GRACEY told her that he was
8 "involved in stocks" and had a "trust fund." GRACEY's wife reported that, in early
9 2015, she learned that GRACEY had been lying about his identity; that GRACEY was
10 Canadian, rather than British; and that GRACEY's father works for Boeing and lives in
11 Bellevue, Washington. GRACEY's wife moved out in February or March 2015.

12 19. I have also reviewed evidence showing that GRACEY's statements about
13 his own wealth were false. For example, as discussed above, GRACEY invited investors
14 to an estate at 75 Beverly Park Lane in Beverly Hills, which GRACEY represented to be
15 his own, or owned by his family. Based on internet research, this is an 8-bedroom estate
16 on a five-acre lot, complete with on-site vineyards, a gym, and mini-spa. This house is
17 currently listed for sale for \$47,500,000. The listing indicates that the property has been
18 for sale since November 2017, meaning that it was listed for sale during the period
19 GRACEY claimed to own the home. An SEC attorney interviewed the property manager
20 of this estate. According to the manager, the estate is owned by an individual unrelated
21 to GRACEY. The property manager stated that GRACEY rented the estate for \$7,500
22 per day between January and April 2018. I have also reviewed property records for the
23 Clyde Hill, Washington property that GRACEY purported to own, and determined that
24 GRACEY rented this property as well.

25 20. I have also reviewed material relating to the luxury cars driven by
26 GRACEY. An SEC attorney interviewed a representative of California Exotic Car
27 Rentals in La Jolla, California. The representative stated that, beginning in April 2017,
28 GRACEY rented four luxury vehicles: a Bentley, two Ferraris, and a Lamborghini. Each

1 of these vehicles typically rents for \$1,800 per day, though GRACEY negotiated a
2 monthly rate for at least one of the cars. The representative stated that, when GRACEY
3 became delinquent on his rental payments, he said that his cash was tied up on an
4 upcoming IPO for a company called "Perspecta."

5 **E. Review of Bank Records**

6 21. I have also reviewed bank and other financial records showing transactions
7 relating to GRACEY. The most active bank account controlled by GRACEY appears to
8 be a Wells Fargo account with an account number ending in the digits 1901 (the "1901
9 Account"). While the FBI's analysis of the 1901 Account is not yet complete, a review
10 of the records substantiates victim statements that they wired tens of thousands or
11 hundreds of thousands of dollars to GRACEY at a time. To date, I have identified over
12 \$3.4 million in wire transfers from known victims. In addition, I have identified over
13 \$300,000 in cash deposits between April 2016 and September 2018.

14 22. As one example, Victim 1 provided wire transfer records showing that on
15 December 30, 2017 Victim 1 initiated an \$80,000 wire transfer from Victim 1's Bellevue,
16 Washington Wells Fargo branch. The records provided by Victim 1 show that the wire
17 was directed to GRACEY's 1901 Account at a Wells Fargo branch in Rancho Santa Fe,
18 California. The records for the 1901 Account show that GRACEY received an \$80,000
19 wire on January 2, 2018, which was the next business day after December 30. This is one
20 example of many interstate wire transfer transmissions that GRACEY caused in
21 furtherance of his fraud, and is the basis of the wire fraud violation alleged above.

22 //

23 //

The above-named agent provided a sworn statement attesting to the truth of the contents of the forgoing affidavit on November 9, 2018. The Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

PAULA L. MCCANDLIS
United States Magistrate Judge

UNITED STATES DISTRICT COURT

Western

District of

Washington

UNITED STATES OF AMERICA

WARRANT FOR ARREST

V.

KEENAN GRACEY

Case Number:

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest KEENAN ALEXANDER GRACEY

Name

and bring him or her forthwith to the nearest magistrate judge to answer a(n)

- ☐ Indictment ☐ Information ☒ Complaint ☐ Order of court
☐ Pretrial Release ☐ Probation ☐ Supervised Release ☐ Violation Notice
 Violation Petition Violation Petition Violation

charging him or her with (brief description of offense)
Wire Fraud

☒ in violation of Title 18 United States Code, Section(s) 1343

☐ in violation of the conditions of his or her pretrial release imposed by the court.

☐ in violation of the conditions of his or her supervision imposed by the court.

Paula L. McCandlis

Name of Issuing Officer

Signature of Issuing Officer

United States Magistrate Judge

Title of Issuing Officer

11/09/2018

Seattle, WA

Date and Location

RETURN

This warrant was received and executed with the arrest of the above-named individual at

DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER

SIGNATURE OF ARRESTING OFFICER

DATE OF ARREST